

**S P B M C C**  
— SULLIVAN PAPAIN BLOCK —  
**MC MANUS COFFINAS & CANNAVO P.C.**

120 BROADWAY • NEW YORK • NEW YORK 10271

Robert G. Sullivan  
Nicholas Papain  
Vito A. Cannavo  
John F. Nash  
Frank V. Floriani  
Eleni Coffinas  
Hugh M. Turk  
Albert B. Aquila  
Brian J. Shoot

Eric K. Schwarz  
Elizabeth Montesano  
Deanne M. Caputo  
Liza A. Milgrim  
Thomas J. McManus  
Glenn W. Nick  
Mark A. Apostolos  
Craig M. Silverman

TELEPHONE: (212) 732-9000  
FACSIMILE: (212) 266-4141  
[SPBMC-NY@TrialLaw1.com](mailto:SPBMC-NY@TrialLaw1.com)  
TrialLaw1.com

PLEASE REPLY TO:  
New York City Office

Jessica P. Denninger  
Christopher J. DelliCarpini  
Ana-Marija Turkovic  
NallyAnn Scaturro  
Michael P. Napolitano  
Jacqueline P. Lasker  
Joseph I. Rozovsky  
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Sahil S. Koul  
Christian Naber

Hon. Joseph N. Giamboi (1925-2018)  
Michael N. Block (1943-2024)  
Stephen C. Glasser  
Paul F. Oliveri  
Of Counsel

John M. Tomskey  
Beth N. Jablon  
Ina Pecani  
Counsel to the Firm

Author's E-Mail Address:  
[NPapain@TrialLaw1.com](mailto:NPapain@TrialLaw1.com)  
Direct Telephone Line:  
(212) 266-4101  
Private Fax Line:  
(212) 266-4161

March 5, 2025

**VIA ECF**

The Honorable Sarah Netburn, United States Magistrate Judge  
United States District Court, Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: **In re Terrorist Attacks on September 11, 2001, Case No. 03 MDL 1570 (GBD)(SN)**  
**Accardi et al v. Islamic Republic of Iran, Case No. 21-cv-06247**  
**Alexander et al v. Islamic Republic of Iran, Case No. 21-cv-03505**  
**Betso et al v. Islamic Republic of Iran, Case No. 21-cv-01394**

**Requests for Corrections/Revisions to the Exhibits Attached to the Report and  
Recommendation, dated Feb. 28, 2025, ECF No. 10755**

Dear Judge Netburn:

The undersigned, as the attorney for the Plaintiffs in the above-referenced actions, respectfully submits this Letter Motion to request that certain corrections/revisions be made to the Exhibits attached to the Report and Recommendation issued by the Court on Feb. 28, 2025, ECF No. 10755 ("R. & R."), which addressed Plaintiffs' motions for partial final judgment by default against Iran and for the award of certain damages, in the above-referenced actions.

**SUFFOLK OFFICE**

33105 Main Road, Cutchogue, New York 11935  
TELEPHONE: (631) 734-2500 • FACSIMILE: (631) 734-2502  
[SPBMC-LI@TrialLaw1.com](mailto:SPBMC-LI@TrialLaw1.com)

**NASSAU OFFICE**

1140 Franklin Avenue, Garden City, New York 11530  
TELEPHONE: (516) 742-0707 • FACSIMILE: (516) 742-7350  
[SPBMC-LI@TrialLaw1.com](mailto:SPBMC-LI@TrialLaw1.com)

**NEW JERSEY OFFICE**

25 Main Street, Suite 602, Hackensack, New Jersey 07601  
TELEPHONE: (201) 342-0037 • FACSIMILE: (201) 342-6461  
[SPBMC-NJ@TrialLaw1.com](mailto:SPBMC-NJ@TrialLaw1.com)

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**I. Plaintiff Margaret Randazzo-Maloy's Solatium Award Not Included in the R. & R. Exhibits**

Margaret Randazzo-Maloy is a plaintiff in the above-referenced *Alexander* action, and the spouse of Decedent, Gene Edward Maloy, who was killed in the Attacks on September 11, 2001. R. & R. at 16. The R. & R. recommended awarding Plaintiff Margaret Randazzo-Maloy \$12.5 million in solatium damages. *Id.* However, it seems this award was inadvertently not included in the exhibits attached to the R. & R. It is therefore respectfully requested that the exhibits to the R & R be revised to include the recommended solatium award of \$12.5 million to Plaintiff Margaret Randazzo-Maloy.

**II. Personal Representative, Sandra Heffernan's Last Name is Misspelled in Exhibit B**

The last name of Personal Representative Sandra Heffernan is misspelled "Hefferman" in Exhibit B, line no. "10". It is respectfully requested that the spelling of her last name be corrected to read "Heffernan".

**III. Decedent, Charles Williams's Last Name is Misspelled in Exhibit C**

The last name of Decedent Charles Williams is misspelled "William" in Exhibit C, line no. "29". It is respectfully requested that the spelling of his last name be corrected to read "Williams".

Thank you for the Court's consideration of the above requests.

Respectfully submitted,



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Nicholas Papain, Esq.  
Sullivan Papain Block McManus  
Coffinas & Cannavo P.C.  
120 Broadway, 27<sup>th</sup> Floor  
New York, NY 10271  
Phone: (212) 732-9000  
COUNSEL FOR PLAINTIFFS  
*IN THE ACCARDI, ALEXANDER,  
AND BETSO ACTIONS*